

EXHIBIT 6

K. W. Lund letter to M. Chalfont and B. O'Brien, dated July 11, 2000

Holme Roberts & Owen LLP

July 11, 2000



Mark Chalfont
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Bradley O'Brien
U. S. Department of Justice
301 Howard Street, Suite 870
San Francisco, California 94105

Re: Casmalia Superfund Site;
Waste Allocated to the former Grace Petroleum Corporation

Kenneth W. Lund
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Dear Messrs. Chalfont and O'Brien:

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As you know, EPA's Waste Summary Report for W.R. Grace & Company pertaining to the Casmalia Superfund Site contains numerous entries for waste shipments from an entity formerly known as Grace Petroleum Corporation ("GPC"). These GPC entries account for approximately 99.4% (72,679,650 lbs.) of the waste EPA's original Waste Summary Report attributes to W.R. Grace. Although prior to 1992 Grace Energy Corporation, a subsidiary of W.R. Grace, owned the stock of GPC, GPC is an entirely separate legal entity. Neither W.R. Grace nor Grace Energy was involved in or exercised control over GPC's day-to-day business operation or, more importantly, GPC's decisions to arrange for the disposal of waste at the Casmalia Site. Accordingly, neither W.R. Grace nor Grace Energy has any liability under CERCLA for wastes disposed of at the Casmalia Site by GPC. See United States v. BestFoods, 524 U.S. 51 (1998).

In 1992, Grace Energy sold to Samson Investment Corporation all shares of stock it held in GPC. Shortly thereafter, GPC was merged into Samson Hydrocarbons Company (formerly known as Samson Natural Gas Company and SNG Production Company) and currently does business under that name. Samson Hydrocarbons is a Delaware corporation with its principal office located at 2 West Second Street, Tulsa, Oklahoma. Records we have reviewed indicate that Dennis Neill and Judy Fox, 2 West Second Street, Tulsa, Oklahoma, are officers and/or directors of both Samson Hydrocarbons and Samson Investment Corporation.

Holme Roberts & Owen LLP

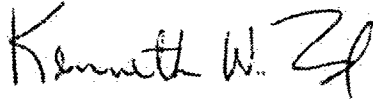
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As the successor in interest to GPC through merger, Samson Hydrocarbons has assumed GPC's CERCLA liability at the Casmalia Site. See e.g., Anspec Company v. Johnson Controls, Inc., 922 F.2d 1240, 1246 (6th Cir. 1991); see also, e.g., United States v. Iron Mountain Mines, Inc., 987 F. Supp. 1233, 1238 (E.D. Cal. 1997).

Excluding the GPC entries, as is appropriate, EPA's original Waste Summary Report shows that the total amount of materials attributable to Grace is 449,208 pounds. This is far below the de minimis cutoff EPA has established for the Site.

Accordingly, W.R. Grace respectfully requests a meeting with EPA and the Department of Justice to discuss the issues addressed above and the de minimis settlement options at the Site. Please contact me at your earliest convenience to begin these discussions.

Sincerely,



Kenneth W. Lund

KWL:cg

cc: Dennis Neill (Samson Hydrocarbons & Co.)
Jack Canon, Esq.